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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

ELECTRIC SOLIDUS, INC. d/b/a
SWAN BITCOIN,

Plaintiff,

v.

PROTON MANAGEMENT LTD., et
al.,

Defendants.

Case No. 2:24-cv-8280-MWC-E

**DECLARATION OF AMANDA H.
RUSSO ISO STIPULATION TO
EXTEND TIME FOR DEFENDANTS
TO ANSWER PLAINTIFF'S FIRST
AMENDED COMPLAINT**

Judge: Hon. Michelle Williams Court

Complaint Filed: September 25, 2024

FAC Filed: January 27, 2024

DECLARATION OF MATTHEW P. KANNY

I, Amanda H. Russo, declare as follows:

1. I am a Partner with the law firm Goodwin Procter LLP and a member of the bar of this Court. I represent Defendants THOMAS PATRICK FURLONG, MICHAEL ALEXANDER HOLMES, ILIOS CORPORATION (“Ilios”), RAFAEL DIAS MONTELEONE, SANTHIRAN NAIDOO, ENRIQUE ROMUALDEZ, and LUCAS VASCONCELOS (collectively, the “Individual Defendants”) in the above-captioned matter. I submit this Declaration in connection with Individual Defendants, Defendant Proton Management Ltd. (“Proton,” together with the Individual Defendants, “Defendants”), and Plaintiff Electric Solidus, Inc. d/b/a Swan Bitcoin’s (“Plaintiff” or “Swan,” and collectively with Defendants, the “Parties”) Stipulation to Extend Time for Defendants to Answer Plaintiff’s First Amended Complaint (“FAC”). Unless stated otherwise, this Declaration is based on my personal knowledge; if called as a witness I could and would testify as follows.

2. Due to the volume of information to be discussed with each Defendant in connection with the FAC, and the limited time between the issuance of the Court’s decision and the current filing deadline, Defendants are requesting to extend the deadline to answer the FAC to allow adequate time to assess matters raised in Plaintiff’s FAC.

3. The Parties have agreed that Defendants may have through and including April 30, 2025 to respond to the FAC.

4. I declare under penalty of perjury under the laws of the United States of America that to the best of my understanding the foregoing is true and correct.

Executed on April 23, 2025

/s/ Amanda H. Russo

AMANDA H. RUSSO